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 UBER TECHNOLOGIES, INC.
 and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

WAYMO LLC,

 Plaintiff,

 v.

 UBER TECHNOLOGIES, INC.,
 OTTOMOTTO LLC; OTTO TRUCKING LLC,

 Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER
 TECHNOLOGIES, INC.'S AND
 OTTOMOTTO LLC'S
 ADMINISTRATIVE MOTION TO
 FILE UNDER SEAL EXHIBITS TO
 AND PORTIONS OF THEIR
 SUPPLEMENTAL BRIEF ON THEIR
 MOTION TO EXCLUDE ONE OF
 THREE OPINIONS PROFFERED BY
 WAYMO EXPERT JIM TIMMINS
 [Dkt. 1612]**

Judge: Hon. William H. Alsup
 Trial Date: October 10, 2017

Pursuant to N.D. Cal. Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (collectively, “Uber”) submit this administrative motion for an order to file under seal portions of and the exhibits to Uber’s Supplemental Brief On Their Motion to Exclude One of Three Opinions Proffered By Waymo Expert Jim Timmins [Dkt. 1612] (“Supplemental Brief”). Specifically, Uber requests an order granting leave to file under seal the confidential portions of the following:

Document	Portions to Be Filed Under Seal	Designating Party
Supplemental Brief	Yellow – highlighted portions	Sandstone Group LLC, and Tyto LiDAR, LLC
Zappala Declaration ISO Supplemental Brief	Yellow – highlighted portions	Sandstone Group LLC, and Tyto LiDAR, LLC
Exhibit 1	Entire Document	Waymo, Sandstone Group LLC, and Tyto LiDAR, LLC
Exhibit 2	Entire Document	Waymo, Sandstone Group LLC, and Tyto LiDAR, LLC
Exhibit 3	Entire Document	Sandstone Group LLC, and Tyto LiDAR, LLC
Exhibit 4	Entire Document	Sandstone Group LLC
Exhibit 5	Entire Document	Sandstone Group LLC, and Tyto LiDAR, LLC
Exhibit 6	Entire Document	Uber and Tyto LiDAR, LLC
Exhibit 9	Red – highlighted portions	Waymo

The yellow-highlighted portions of the Supplemental Brief and the red-highlighted portions of Exhibit 9; the entirety of Exhibits 1 and 2 contain information that I understand Waymo designated or may consider to be “Confidential” and/or “Highly Confidential – Attorneys’ Eyes Only” under the Protective Order in this case. (See Zappala Decl. ISO Uber’s Administrative Motion to File Under Seal, ¶ 3.) Uber’s request is narrowly tailored to information Waymo designated and considers “Highly Confidential—Attorneys’ Eyes Only” under the Protective Order, or asked to be sealed. (*Id.*)

1 Uber further seeks to seal the yellow-highlighted portions of the Supplemental Brief, the
 2 Zappala Declaration ISO Supplemental Brief, and the entirety of Exhibits 1, 2, 3, 4, 5, and 6,
 3 because they contain information that third parties have designated confidential and/or highly
 4 confidential. The Supplemental Brief and Exhibits 1, 2, 3, 4, and 6 contain information that has
 5 been designated as confidential by non-parties Sandstone Group, LLC, and Tyto LiDAR, LLC.
 6 (*Id.* ¶ 4.)

7 3. The entirety of Exhibit 6 is a third party's Operating Agreement, which was
 8 obtained in connection with a business agreement and contains confidential information about the
 9 operating details of this third party. This information is not publicly known, and its confidentiality
 10 is strictly maintained. I understand that disclosure of this information could allow competitors and
 11 counterparties to gain insight into how Defendants structure their business agreements with
 12 respect to certain types of third parties, such that Defendants' competitive standing would be
 13 harmed. (*Id.* ¶ 5.)

14 Pursuant to Civil Local Rule 79-5(d)(2), Uber will lodge with the Clerk the documents at
 15 issue, with accompanying chamber copies. Uber served Waymo with this motion on September
 16 28, 2017.

17 Dated: September 28, 2017

BOIES SCHILLER FLEXNER LLP

18 By: /s/ Karen L. Dunn
 19 Karen L. Dunn

20 *Counsel for Defendants*
 21 UBER TECHNOLOGIES, INC. AND
 22 OTTOMOTTO LLC
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